

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Accelerating Wireline Broadband Deployment by)	
Removing Barriers to Infrastructure Investment)	WC Docket No. 17-84

MOTION FOR EXTENSION OF TIME

Public Knowledge, The Greenlining Institute, the National Association of the Deaf, the Center for Rural Strategies, the Kentucky Resources Council, the National Consumer Law Center on behalf of its low-income clients, Telecommunications for the Deaf and Hard of Hearing, Inc., Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing (DHH-RERC), and the United Church of Christ (“Movants”) respectfully request a 30-day extension of time of both the initial comment and reply comment deadlines¹ in the above-captioned proceeding. Owing to the exceptional complexity of the issues at play here, the substantial length of the proceedings whose reversal is proposed, and the broad substantive array of issues at hand, an exception to the Commission’s ordinary policy regarding requests for extension of time is warranted.

First, an extension is warranted because the issues contemplated by this item are technically complex. As discussed at length in the proceeding which led to the rules whose elimination is contemplated here, copper retirement and the tech transitions process present a variety of complex issues which implicate a broad array of stakeholders, including many consumers and organizations who rely substantially on the copper-backed PSTN but are not

ordinary participants in FCC proceedings. As the reports from AT&T's trials demonstrated, the issues at play in the tech transitions portion of this item alone are complex and require careful consideration.² Given this significant level of technical complexity and the potential for serious impacts nationwide which are presented by the NRPM's proposals, additional time to ensure a robust and complete record is warranted.

Furthermore, the NPRM contemplates reversing significant proceedings whose resolution was reached over a period of years, on the basis of a 30-day comment and 30-day reply record. For example, the 2015 Tech Transitions Order was arrived at following the establishment, in 2012, of the Technology Transitions Policy Task Force.³ Over a period of three years, the FCC sought comment and developed a robust record in order to arrive at the policies adopted in both the 2014 Declaratory Ruling⁴ and the 2015 Tech Transitions Order.⁵ Trials were conducted,⁶ the

¹ See Wireline Competition Bureau Announces Deadlines For Filing Comments And Reply Comments In The Wireline Infrastructure Proceeding, *Public Notice*, WC Docket No. 17-84 (rel. May 16, 2017).

² Cite to AT&T Trials Reports.

³ See Ex Parte Meetings with the Technology Transitions Policy Task Force, *Public Notice*, GN Docket No. 13-5 (rel. Jan 10, 2013) ("On December 12, 2012, Chairman Julius Genachowski announced the formation of an agency-wide Technology Transitions Policy Task Force to provide recommendations on how to modernize the Commission's policies in a manner that encourages the technology transition, empowers and protects consumers, promotes competition, and ensures network resiliency and reliability.")

⁴ See Technology Transitions et. al., *Notice of Proposed Rulemaking and Declaratory Ruling*, GN Docket No. 13-5 (rel. Nov. 25, 2014).

⁵ See Technology Transitions et. al., *Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking*, GN Docket No. 13-5 (rel. Aug. 7, 2015).

⁶ See, e.g. Commission Seeks Comment on AT&T Proposal for Service-Based Technology Transitions Experiments, *Public Notice*, GN Docket Nos. 12-353, 13-5 (rel. Feb. 28, 2014); Commission Seeks Comment on Proposal of Iowa Network Services, Inc. for Service-Based Technology Transitions Experiment, *Public Notice*, GN Docket Nos. 12-353, 13-5 (rel. Feb. 21, 2014).

task force hosted multiple workshops,⁷ and several years worth of comment were sought before arriving at the rules whose reversal is contemplated. To set that progress aside on the basis of so brief a comment period would be inappropriate, and accordingly, an extension to facilitate adequate deliberation and development of the record is warranted.

Finally, in addition to proposing broad reversal of the rules arrived at through the detailed deliberative process above, the Commission adds revision of its pole attachment rules and a broad inquiry into preemption authority to the proceeding, under the broad “Wireline Infrastructure” umbrella. This brief comment window is not adequate to fully develop a record which might sufficiently address the diverse and complex issues raised by any one of these three main topics, let alone all three at once.

In sum, the scope and significance of the issues contemplated by this proceeding are exceptional, and due care is necessary in ensuring that an adequate record is established on all the diverse issues raised. Accordingly, Movants request that the Commission grant this request for an extension of comment and reply deadlines in the above-captioned proceeding.

Respectfully Submitted,

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⁷ See, e.g. FCC Announces First Technology Transitions Policy Task Force Workshop, *Public Notice*, GN Docket No. 13-5 (rel. Feb. 12, 2013); FCC Announces Second Technology Transitions Policy Task Force Workshop, *Public Notice*, GN Docket No. 13-5 (rel. Sep. 12, 2013).

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